

EXHIBIT B

1 A. **Yes and no.**
 2 Q. How "yes" and how "no"?
 3 A. **It is a separate entity, but without**
 4 **Cycle-Craft, it wouldn't be there.**
 5 Q. Okay. And let me focus on the first half of
 6 that.
 7 When you say it's a separate
 8 entity, do you know whether it's
 9 incorporated?
 10 A. **Actually, I think they did at one point.**
 11 **They were trying to incorporate themselves**
 12 **in a separate thing. I don't know whether**
 13 **they ever went through with that, so I can't**
 14 **answer you that honestly.**
 15 Q. All right. As to --
 16 A. **Harley Owners Groups and dealerships kind of**
 17 **work hand and hand. You can't have a Harley**
 18 **Owners Group club unless you're a dealer,**
 19 **and each dealer can only have one Harley**
 20 **Owners Group.**
 21 Q. Is that something that Harley-Davidson
 22 states, to your knowledge?
 23 A. **Yes. And the dealership is also responsible**
 24 **for the Harley Owners Group.**

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1 Q. In what ways?
 2 A. **Make sure that they're doing the right**
 3 **thing, riding the straight and narrow and**
 4 **that they're doing -- the purpose of the**
 5 **club is to go out and have fun and be a**
 6 **family-oriented group.**
 7 Q. But the officers of the Boston Harley Owners
 8 Group are not the officers of Cycle-Craft;
 9 is that right?
 10 MR. REHNQUIST: Object to the form.
 11 A. **Sometimes they are and sometimes they**
 12 **aren't.**
 13 Q. Today are they?
 14 A. **No.**
 15 Q. And they are not always; is that correct?
 16 A. **They aren't always. And other chapters**
 17 **around the country -- of course, you know,**
 18 **we're generalizing here, but other chapters**
 19 **around the country have the owners as the**
 20 **director and they'll have, you know,**
 21 **employees be the officers on the board**
 22 **and some clubs they don't do that at all.**
 23 Q. How are the officers of the Boston Harley
 24 Owners Group selected, to your knowledge?

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1 A. **Well, there's two ways; either they are**
 2 **appointed by the dealer principal or they're**
 3 **elected by the group.**
 4 Q. Okay. And what way is it for the Boston
 5 Harley Owners Group?
 6 A. **Both.**
 7 Q. Okay.
 8 A. **Depending upon what year.**
 9 Q. Okay. Currently how are the officers for
 10 the Boston Harley Owners Group selected?
 11 A. **Appointed.**
 12 Q. So, you have made appointments of the
 13 officers?
 14 A. **Yes.**
 15 Q. And when did you start doing that?
 16 A. **Last year.**
 17 Q. Before last year, how were the officers
 18 selected for --
 19 A. **Elected.**
 20 Q. Let me just finish the question.
 21 A. **I'm sorry.**
 22 Q. That's okay.
 23 Before last year, how were the
 24 officers for the Boston Harley Owners Group

1 selected?

2 A. **They were elected.**
 3 Q. And for how long were they elected, that is,
 4 for what period of years that you can
 5 recall?
 6 A. **Two.**
 7 Q. And prior to that, did you appoint officers
 8 of the Boston Harley Owners Group?
 9 A. **Yes.**
 10 Q. What is it that causes you, if anything, to
 11 want to make the appointment versus having
 12 an election?
 13 A. **If I feel as though the candidates for the**
 14 **election are dishonest or not.**
 15 Q. Have there been times when an individual or
 16 individuals that you believed to be
 17 dishonest have been elected and you have
 18 chosen to remove those individuals?
 19 A. **Yes. I should say dishonest and people that**
 20 **also don't follow the guidelines of the**
 21 **Harley Owners Group.**
 22 Q. So, there have been occasions where you've
 23 had to step in and appoint your own
 24 officers for those reasons you've just